

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GABRIELA RAMIREZ, FIDELA AVINA, RUEL NIETO, KATHERINE RANOS, and EVALINA GONZALEZ, on behalf of themselves and all others similarly situated,)	Case No. 1:17-cv-02626
)	Judge: Jorge L. Alonso
Plaintiff,)	Magistrate Judge: Susan E. Cox
v.)	
MIDLAND FUNDING, LLC; MIDLAND CREDIT MANAGEMENT, INC.; and ENCORE CAPITAL GROUP, INC.,)	
Defendants.)	

MOTION TO COMPEL ARBITRATION

Defendants, MIDLAND FUNDING, LLC (MF), MIDLAND CREDIT MANAGEMENT, INC. (MCM) and ENCORE CAPITAL GROUP, INC. (Encore), by and through their attorneys David M. Schultz and Lindsey A.L. Conley of Hinshaw & Culbertson LLP, moves this Honorable Court to compel arbitration of Plaintiffs' claims. Defendants incorporate herein by reference the arguments made and the authorities cited in their Memorandum of Law in support of their Motion to Compel Arbitration which has been filed contemporaneously with the instant motion.

WHEREFORE, Defendants, MIDLAND FUNDING, LLC, MIDLAND CREDIT MANAGEMENT, INC. and ENCORE CAPITAL GROUP, INC., respectfully request that this Court enter an order granting Defendants' motion to compel arbitration.

Respectfully submitted,

MIDLAND FUNDING, LLC, MIDLAND
CREDIT MANAGEMENT, INC. AND
ENCORE CAPITAL GROUP, INC.,
Defendants

/s/ *Lindsey A.L. Conley*

David M. Schultz
Lindsey A.L. Conley
Hinshaw & Culbertson LLP
222 North LaSalle Street, Suite 300
Chicago, IL 60601-1081
Tel: 312-704-3000
E-mail: dschultz@hinshawlaw.com
E-mail: lconley@hinshawlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on **March 16, 2018**, I electronically filed with the Clerk of the U.S. District Court, Northern District of Illinois Eastern Division, the foregoing **Motion to Compel Arbitration** by using the CM/ECF system, which will send notification of such filing(s) to:

Michael Wood
Celettha Chatman
COMMUNITY LAWYERS GROUP, LTD.
73 W. Monroe Street, Suite 514
Chicago, IL 60603
Phone: (312) 757-1880
Fax: (312) 476-1362
mwood@communitylawyersgroup.com
cchatman@communitylawyersgroup.com

/s/ *Lindsey A.L. Conley*